

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SRI INTERNATIONAL, INC., a California  
Corporation,

Plaintiff and  
Counterclaim-Defendant,

v.

INTERNET SECURITY SYSTEMS, INC.,  
a Delaware corporation, INTERNET  
SECURITY SYSTEMS, INC., a Georgia  
corporation, and SYMANTEC  
CORPORATION, a Delaware corporation,

Defendants and  
Counterclaim-Plaintiffs.

C. A. No. 04-1199 (SLR)

**[PROPOSED] MULTI-PART GENERAL  
VERDICT FORM**

We, the jury in the above-entitled action, unanimously find the following  
general verdict on the questions submitted to us:

**I. INFRINGEMENT BY DEFENDANTS****'615 Patent**

1. **Direct – Literal:** Do you find that SRI has proven by a preponderance of the evidence that *Symantec* literally infringes the following claims of the '615 patent?

	<b>YES (for SRI)</b>	<b>NO (for Symantec)</b>
Claim 1:	_____	_____
Claim 2:	_____	_____
Claim 4:	_____	_____
Claim 13:	_____	_____
Claim 14:	_____	_____
Claim 16:	_____	_____

2. **Direct – Doctrine of Equivalents:** If you answered "NO" as to any claim(s) in question 1, do you nevertheless find that SRI has proven by a preponderance of the evidence that *Symantec* infringes such claim(s) of the '615 patent under the doctrine of equivalents?

	<b>YES (for SRI)</b>	<b>NO (for Symantec)</b>
Claim 1:	_____	_____
Claim 2:	_____	_____
Claim 4:	_____	_____
Claim 13:	_____	_____
Claim 14:	_____	_____
Claim 16:	_____	_____

3. **Inducement - Literal:** Do you find that SRI has proven by a preponderance of the evidence that *Symantec* induces literal infringement by its customers of the following claims of the '615 patent?

	<b>YES (for SRI)</b>	<b>NO (for Symantec)</b>
Claim 1:	_____	_____
Claim 2:	_____	_____
Claim 4:	_____	_____
Claim 13:	_____	_____
Claim 14:	_____	_____
Claim 16:	_____	_____

4. **Inducement – Doctrine of Equivalents:** If you answered “NO” as to any claim(s) in question 3, do you nevertheless find that SRI has proven by a preponderance of the evidence that *Symantec* induces infringement by its customers of such claim(s) of the '615 patent under the doctrine of equivalents?

	<b>YES (for SRI)</b>	<b>NO (for Symantec)</b>
Claim 1:	_____	_____
Claim 2:	_____	_____
Claim 4:	_____	_____
Claim 13:	_____	_____
Claim 14:	_____	_____
Claim 16:	_____	_____

5. **Direct – Literal:** Do you find that SRI has proven by a preponderance of the evidence that *ISS* literally infringes the following claims of the ‘615 patent?

	<b>YES (for SRI)</b>	<b>NO (for ISS)</b>
Claim 1:	_____	_____
Claim 2:	_____	_____
Claim 4:	_____	_____
Claim 13:	_____	_____
Claim 14:	_____	_____
Claim 16:	_____	_____

6. **Direct – Doctrine of Equivalents:** If you answered “NO” as to any claim(s) in question 5, do you nevertheless find that SRI has proven by a preponderance of the evidence that *ISS* infringes such claim(s) of the ‘615 patent under the doctrine of equivalents?

	<b>YES (for SRI)</b>	<b>NO (for ISS)</b>
Claim 1:	_____	_____
Claim 2:	_____	_____
Claim 4:	_____	_____
Claim 13:	_____	_____
Claim 14:	_____	_____
Claim 16:	_____	_____

7. **Inducement - Literal:** Do you find that SRI has proven by a preponderance of the evidence that *ISS* induces literal infringement by its customers of the following claims of the '615 patent?

	<b>YES (for SRI)</b>	<b>NO (for ISS)</b>
Claim 1:	_____	_____
Claim 2:	_____	_____
Claim 4:	_____	_____
Claim 13:	_____	_____
Claim 14:	_____	_____
Claim 16:	_____	_____

8. **Inducement – Doctrine of Equivalents:** If you answered “NO” as to any claim(s) in question 7, do you nevertheless find that SRI has proven by a preponderance of the evidence that *ISS* induces infringement by its customers of such claim(s) of the '615 patent under the doctrine of equivalents?

	<b>YES (for SRI)</b>	<b>NO (for ISS)</b>
Claim 1:	_____	_____
Claim 2:	_____	_____
Claim 4:	_____	_____
Claim 13:	_____	_____
Claim 14:	_____	_____
Claim 16:	_____	_____

**'338 Patent**

9. **Direct – Literal:** Do you find that SRI has proven by a preponderance of the evidence that *ISS* literally infringes the following claims of the '338 patent?

	<b>YES (for SRI)</b>	<b>NO (for ISS)</b>
Claim 1:	_____	_____
Claim 4:	_____	_____
Claim 5:	_____	_____
Claim 11:	_____	_____
Claim 12:	_____	_____
Claim 13:	_____	_____
Claim 24:	_____	_____

10. **Direct – Doctrine of Equivalents:** If you answered “NO” as to any claim(s) in question 9, do you nevertheless find that SRI has proven by a preponderance of the evidence that *ISS* infringes such claim(s) of the '338 patent under the doctrine of equivalents?

	<b>YES (for SRI)</b>	<b>NO (for ISS)</b>
Claim 1:	_____	_____
Claim 4:	_____	_____
Claim 5:	_____	_____
Claim 11:	_____	_____
Claim 12:	_____	_____
Claim 13:	_____	_____
Claim 24:	_____	_____

11. **Inducement - Literal:** Do you find that SRI has proven by a preponderance of the evidence that *ISS* induces literal infringement by its customers of the following claims of the '338 patent?

	<b>YES (for SRI)</b>	<b>NO (for ISS)</b>
Claim 1:	_____	_____
Claim 4:	_____	_____
Claim 5:	_____	_____
Claim 11:	_____	_____
Claim 12:	_____	_____
Claim 13:	_____	_____
Claim 24:	_____	_____

12. **Inducement – Doctrine of Equivalents:** If you answered “NO” as to any claim(s) in question 11, do you nevertheless find that SRI has proven by a preponderance of the evidence that *ISS* induces infringement by its customers of such claim(s) of the '338 patent under the doctrine of equivalents?

	<b>YES (for SRI)</b>	<b>NO (for ISS)</b>
Claim 1:	_____	_____
Claim 4:	_____	_____
Claim 5:	_____	_____
Claim 11:	_____	_____
Claim 12:	_____	_____
Claim 13:	_____	_____
Claim 24:	_____	_____

**II. VALIDITY****'615 Patent**

13. **Anticipation:** Have defendants proven by clear and convincing evidence that any of the following claims of the '615 patent are invalid as anticipated based on the prior art?

	<b>NO (for SRI)</b>	<b>YES (for defendants)</b>
Claim 1:	_____	_____
Claim 2:	_____	_____
Claim 4:	_____	_____
Claim 13:	_____	_____
Claim 14:	_____	_____
Claim 16:	_____	_____

14. **Obviousness:** Have defendants proven by clear and convincing evidence that any of the following claims of the '615 patent are invalid as obvious based on the prior art?

	<b>NO (for SRI)</b>	<b>YES (for defendants)</b>
Claim 1:	_____	_____
Claim 2:	_____	_____
Claim 4:	_____	_____
Claim 13:	_____	_____
Claim 14:	_____	_____
Claim 16:	_____	_____



15. **Best Mode:** Have defendants proven by clear and convincing evidence that any of the following claims of the '615 patent are invalid because of a failure by the named inventors to disclose what they believed to be the best mode of practicing their invention?

	<b>NO (for SRI)</b>	<b>YES (for defendants)</b>
Claim 1:	_____	_____
Claim 2:	_____	_____
Claim 4:	_____	_____
Claim 13	_____	_____
Claim 14:	_____	_____
Claim 15:	_____	_____
Claim 16:	_____	_____

**'338 Patent**

16. **Anticipation:** Has ISS proven by clear and convincing evidence that any of the following claims of the '338 patent are invalid as anticipated based on the prior art?

	<b>NO (for SRI)</b>	<b>YES (for ISS)</b>
Claim 1:	_____	_____
Claim 4:	_____	_____
Claim 5:	_____	_____
Claim 11:	_____	_____
Claim 12:	_____	_____
Claim 13:	_____	_____
Claim 24:	_____	_____

17. **Obviousness:** Has ISS proven by clear and convincing evidence that any of the following claims of the '338 patent are invalid as obvious based on the prior art?

	<b>NO (for SRI)</b>	<b>YES (for ISS)</b>
Claim 1:	_____	_____
Claim 4:	_____	_____
Claim 5:	_____	_____
Claim 11:	_____	_____
Claim 12:	_____	_____
Claim 13:	_____	_____
Claim 24:	_____	_____

18. **Best Mode:** Has ISS proven by clear and convincing evidence that any of the following claims of the '338 patent are invalid because of a failure by the named inventors to disclose what they believed to be the best mode of practicing their invention?

	<b>NO (for SRI)</b>	<b>YES (for defendants)</b>
Claim 1:	_____	_____
Claim 4:	_____	_____
Claim 5:	_____	_____
Claim 11:	_____	_____
Claim 12:	_____	_____
Claim 13:	_____	_____
Claim 24:	_____	_____

Dated: \_\_\_\_\_

Jury Foreperson